UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

In re: Equifax, Inc. Customer Data Security Breach Litigation

MDL Docket No. 2800 No. 1:17-md-2800-TWT

This document relates to:

FINANCIAL INSTITUTION ACTIONS

DECLARATION OF JOSEPH P. GUGLIELMO IN SUPPORT OF THE CUNA/ICBA GROUP'S LEADERSHIP APPLICATION

I, Joseph P. Guglielmo, pursuant to 28 U.S.C. §1746, declare as follows:

- 1. I am a partner at the law firm of Scott+Scott, Attorneys at Law, LLP and admitted to practice before this Court. I have personal knowledge of the matters stated herein and if called upon, I could and would competently testify thereto.
- 2. I submit this Declaration in Support of the Application of the "CUNA/ICBA Group" to Serve as Co-Lead Counsel, Co-Liaison Counsel, and Plaintiffs' Steering Committee for the Financial Institution Plaintiffs, and have personal knowledge of the facts below.
- 3. I have reviewed the relevant dockets and filings related to the financial institution actions.

- 4. By my count, 71 different financial institutions have filed actions that are pending before this Court.
- 5. By my count, counsel for 63 of the 71 financial institutions support the CUNA/ICBA Group's leadership application.
- 6. The CUNA/ICBA Group's clients include credit unions, banks, and national and statewide credit union and banking associations.
- 7. Attached to this Declaration are the résumés of the law firms and biographies of the attorneys seeking appointment to leadership positions as part of the CUNA/ICBA Group.
- 8. Attached hereto as **Exhibit 1** is a copy of the firm résumé of Scott+Scott, Attorneys at Law, LLP and the biography of Joseph P. Guglielmo.
- 9. Attached hereto as **Exhibit 2** is a copy of the firm résumé of Carlson Lynch Sweet Kilpela & Carpenter, LLP and the biography of Gary F. Lynch.
- 10. Attached hereto as Exhibit 3 is a copy of the firm résumé of Gillen,Withers & Lake LLC and the biography of Craig A. Gillen.
- 11. Attached hereto as **Exhibit 4** is a copy of the firm résumé of The Finley Firm, P.C. and the biography of MaryBeth V. Gibson.
- 12. Attached hereto as **Exhibit 5** is a copy of the firm résumé of Murray Law Firm and the biography of Arthur M. Murray.

13. Attached hereto as Exhibit 6 is a copy of the firm résumé of Robins

Kaplan, LLP and the biography of Stacey P. Slaughter.

14. Attached hereto as **Exhibit 7** is a copy of the firm résumé of Berman

Fink Van Horn, P.C. and the biography of Charles Hale Van Horn.

15. Attached hereto as **Exhibit 8** is a copy of the firm résumé of Carney

Bates & Pulliam PLLC and the biography of Joseph Henry (Hank) Bates, III.

16. Attached hereto as **Exhibit 9** is a copy of the firm résumé of Chestnut

Cambronne, PA and the biography of Bryan L. Bleichner.

17. Attached hereto as Exhibit 10 is a copy of the firm résumé of

Lockridge Grindal Nauen P.L.L.P. and the biography of Karen H. Riebel.

18. Attached hereto as **Exhibit 11** is a copy of the firm résumé of Roberts

Law Firm, PA and the biography of Karen S. Halbert.

19. Attached hereto as Exhibit 12 is a copy of the firm résumé of

Zimmerman Reed LLP and the biography of Brian C. Gudmundson.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 2, 2018

Joseph F. Guglielmo